

From: manish@inwea.org
To: Harpreet Singh Pruthi <secy@cercind.gov.in>
Cc: Shilpa Agarwal <shilpa@cercind.gov.in>
Sent: Mon, 25 Nov 2024 21:14:17 +0530 (IST)
Subject: Comments/ Suggestions/ Objections on (Sharing of Inter-State Transmission Charges and Losses) (Fourth Amendment) Regulations, 2024.

To,

The Secretary
Central Electricity Regulatory Commission,
6th, 7th & 8th Floors, Tower B, World Trade Centre,
Nauroji Nagar, New Delhi- 110029

Respected Sir,

With reference to the Hon'ble Commission's Order referred above inviting comments/suggestions/objections from the respondent and the different stake-holders.

In this regard, We, Indian Wind Energy Association (**InWEA**), would like to take an opportunity to introduce ourselves, as an association, registered at New Delhi to represent the interest of various stakeholders in wind energy sector. **InWEA**, with more than 300 members, representing different parts of wind industry has been dedicated to promotion and development of wind power in India.

We would like to submit our comments/suggestions/objections on the referred matter for the consideration of Hon'ble Commission. Our comments/suggestions/objections are summarised in Annexure I and we are filling the same along with the affidavit.

I, Manish K Singh, am duly authorised by Indian Wind Energy Association to file these comments/suggestions/objections on its behalf.

Thanking you,

With warm regards,

Manish K. Singh
Secretary General,
Indian Wind Energy Association,
CISRS House
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Annexure-1:- Comments

| Sr. No. | Clause No | Description | InWEA's Comments/ Suggestions | Justification |
|---------|--------------|--|---|---|
| 1 | 13-(2-6-f-i) | <p>(6) The sub-clause (f) of Clause (2) of Regulation 13 of the Principal Regulations shall be substituted as under:</p> <p>“(f) Waiver for REGS or RHGS based on wind or solar source or ESS or new Hydro projects or Green hydrogen or Green Ammonia Plants shall be calculated in terms of the following:</p> <p>(i) REGS or RHGS based on wind or solar source or Battery ESS which is declared under commercial operation after 30.6.2025 or Hydro PSP ESS which has awarded the construction contract after 30.6.2025 shall be eligible for grant of waiver in the following manner:</p> <p>Category (i) Period of COD (for REGS or RHGS based on wind or solar source and Battery ESS / (ii) Period of award of construction work (for hydro PSP ESS) Number of years from COD % of drawl Schedule from identified generating station or ESS,to be considered under Annexure-III REGS or RHGS based on wind or solar source or Hydro PSP ESS</p> <p>1.7.2025 to 30.6.2026- 25 years- 75 1.7.2026 to 30.6.2027- 25 years- 50 1.7.2027 to 30.6.2028- 25 years- 25 After 30.6.2028- 0</p> <p>Battery ESS</p> <p>1.7.2025 to 30.6.2026- 12 years -75 1.7.2026 to 30.6.2027- 12 years- 50 1.7.2027 to 30.6.2028- 12 years- 25 After 30.6.2028- 0</p> | <p>REGS or RHGS based on wind or solar source or Hydro PSP ESS</p> <ul style="list-style-type: none"> • 1.4.2032 to 31.3.2033- 25 years -75 • 1.4.2033 to 31.3.2034 - 25 years -50 • 1.4.2034 to 31.3.2035- 25 years -25 • After 31.3.2035 - 0 | <p>As highlighted in the Transmission System for Integration of over 500 GW RE Capacity by 2030 report (released in December 2022), a comprehensive transmission infrastructure is being developed to support the ambitious renewable energy (RE) capacity addition target of 500 GW by 2030. This includes the phased development of transmission systems to ensure the seamless evacuation and integration of renewable energy into the grid.</p> <p>Further, the National Electricity Plan (NEP) Volume-II (released in October 2024) provides a detailed roadmap for renewable energy integration. It specifies that the transmission network required to handle 164 GW of renewable energy capacity will be in place by March 2032, reflecting significant ongoing progress in enhancing grid infrastructure to accommodate growing RE capacities. Given the current pace of development, the proposed renewable energy transmission corridors are at various stages of implementation. These corridors are critical to meeting national RE targets and ensuring grid stability.</p> <p>We request the Hon'ble CERC to extend the ISTS transmission charges waiver for renewable energy projects, considering the Ministry of Power's targets and the NEP timelines. This will provide financial relief to RE developers, accelerate RE deployment, and support India's clean energy transition.</p> |

